TOAST Safeguarding Policy

September 2023 – for Review September 2024

Purpose of Policy

To set out the duty to safeguard and promote the welfare of all learners at TOAST and how this will be implemented by the TOAST Education Team in the discharge of its duties.

Policy Statement

To develop procedures and good practice within TOAST to ensure that each person can demonstrate that there is an understanding of the duty to safeguard and promote the welfare of all learners. To provide evidence of how this is being implemented within its organisation and within multi-agency working arrangements and of its plans to address any gaps in these arrangements.

Policy Application

This policy applies to all members of staff of TOAST and all those organisations who have a working relationship with the TOAST provision, including volunteers.

Introduction

Safeguarding is everyone's responsibility and all staff who, during the course of their employment have direct or indirect contact with learners, or who have access to information about them, have a responsibility to safeguard and promote the welfare of learners.
There is a duty on organisations to make appropriate arrangements to safeguard and promote the welfare of anyone who uses the service. Also, government guidance makes it clear that it is a shared responsibility and depends upon effective joint working between agencies and professionals.

Monitoring and filtering

We are committed to monitoring our safeguarding concerns. We use Cpoms and our in-house database Raisers Edge to report, log monitor and filter concerns, identify areas of trends and developments, including internet safety concerns.

Our internet systems are monitored by Focus. They monitor, filter and alert the organisation of inappropriate/unsafe searches and block unsafe or inappropriate content.

Students as part of their induction are informed that whilst at college their internet searches will be restricted to safe searches. Students are also informed of our internet safety policy and behavior expectations. All learners when accessing the internet (in class time only) are monitored by staff, the teacher and TAs regularly walk around the room to check learners screens. Focus can also access learners and staffs screens for monitoring purposes.

We have weekly meetings, which include safeguarding updates. The DSL (Emma Wooderson) and the DDSL (Lowena Mudge) meet once a week (more when required) to support one another with reported concerns and escalation of concerns. We have Step into Learning quarterly meeting whereby we report on safeguarding trends and monitor on-going concerns for enrolled Step into learning students. Safeguarding trends are embedded in curriculum mapping and planning to ensure we are supporting learners needs.

As an education provider we have monthly safeguarding meetings to report on safeguarding concerns and monitoring. Senior managers are present to ensure safeguarding staff are supported, to recognize training needs and to ensure processes are being followed.
We provide all staff with a confidential and free support line to access inside and outside of work hours. We also provide staff with referrals to counselling services to support well-being.

All staff receive training on reporting concern procedures and are aware of how to act, following the TED (Tell me, Explain, describe) framework, ensuring they approach disclosures with calmness, listening to the learner and reporting only the facts of the conversation/observed concern. All staff know that if a concern is immediate, as the young person may be at risk of harm or serious harm to report immediately to the DSL or DDSL on who are on the premises during and after learners college hours.

All learners and staff have access to the organisational staffing structure and are made aware of who to contact if they have a concern.

Definition

The main forms of abuse as identified are divided into the following categories:

- **Physical abuse** – including assault, slapping, hitting, punching, misuse of medication, restraint or other inappropriate physical sanctions; and female genital mutilation.
- **Domestic abuse** – including psychological, physical, sexual, financial, emotional abuse; Forced Marriage and 'honour-based' abuse.
- **Sexual violence** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual

photography, subjection to pornography or witnessing sexual acts and sexual assault or sexual acts to which the adult has not consented or was coerced.

- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks; and belief in spirit possession

- **Financial or material abuse** – including coercion to take extortionate loans and threats to recover debt, theft, fraud, over-charging, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

- **Discriminatory abuse** – including forms of verbal or physical harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

- **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home or in relation to care provided in the person's own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. Failure to follow agreed processes.

- **Self-neglect** – this covers a wide range of behaviours, neglecting to care for one's own personal hygiene, health or surroundings and includes behaviour such as hoarding that causes a risk of harm to self and or others

Safeguarding Policy Objectives

The following principles will underpin all of our work:

- Everyone has the right to live his or her life free from violence, fear and abuse.
- Everyone has the right to be protected from harm and exploitation.
- Everyone has the right to independence, which carries with it a degree of risk.

Equality and Diversity

Equality is based on the idea of fairness whilst recognising that everyone is different, and diversity is about the ways in which people differ and about recognising that differences are a natural part of society. TOAST expects that all staff and volunteers who come into contact with the wide range of learners treat them as individuals and make them feel respected and valued as an essential part of our commitment to safeguarding.

The Prevent Strategy

Prevent is part of a Government initiative to develop a robust counter terrorism and extremism programme – CONTEST. The UK faces a range of terrorist threats including its ideologies and methodologies. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health.

Criminal Exploitation of Children and Vulnerable Adults (County Lines Guidance) Home Office 2018

This publication provides guidance about Child Criminal Exploitation and County Lines Exploitation which, like any other forms of abuse and exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

The national picture on county lines continues to develop but there are recorded cases of:

- Children as young as 12 years old being exploited or moved by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females being exploited.
- White British children being targeted because gangs perceive they are more likely to evade police detection but a person of any ethnicity or nationality may be exploited.
- The use of social media to make initial contact with children and young people.
- Class A drug users being targeted so that gangs can take over their homes (known as 'cuckooing').

Any practitioner working with a vulnerable person who they think may be at risk of county lines exploitation should follow their local safeguarding guidance and share this information with local authority social services. If you believe a person is in immediate risk of harm, you should **contact the police.**
Further guidance can be found at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf
We are advised to use our local safeguarding process, the first step of which is usually to contact your designated safeguarding lead within your organisation.

Our commitment to PACE:

All staff learner facing are undertaking the Level 1 Child Criminal Exploitation and County Lines Training with PACE (Parents Against Child Exploitation) to ensure all staff are aware of the warning signs to be vigilant in safeguarding the young people we work with. We are proud to be committed to the values of Pace. Supporting parents and young people without judgement.

The DSL and DDSL also keep up to date with the police training on County Lines relevant to the area of Cornwall.

Responsibilities for Safeguarding and Prevent

TOAST will ensure that:

All staff are committed to safeguarding and promoting the welfare of children, young people and adults at risk, that they demonstrate leadership, are informed about and take full responsibility for the actions of staff who provide services to all people who use the service and their families or carers at all levels.
This means:

- Ensuring the highest standards of safe recruitment, supervision and management oversight of staff;
- Ensuring that children, young people and adults at risk are seen and listened to and that their views are taken fully into account when making decisions;
- Taking appropriate action regarding any concerns expressed about their welfare, commensurate with their rights to privacy and wherever possible on the basis of valid consent (i.e. has capacity to consent in accordance with the Mental Capacity Act 2005, has sufficient information to make a choice and has given their consent freely);
- Ensuring an ethos which upholds core values of shared responsibility and wellbeing for all students, trainees, staff, volunteers and visitors and promotes respect, equality and diversity and understanding.
- Ensuring a curriculum which promotes knowledge, skills and understanding to build the resilience of students and trainees, by undermining extremist ideology and supporting the learner voice.
- All members of staff and volunteers who are employed by TOAST and who have contact with children, young people, adults and their families or carers, will have a clear understanding of the Teams responsibilities for safeguarding;
- A statement of TOASTS responsibilities towards all learners will be available to all staff; this will include effective systems to ensure that complaints about non-compliance with safeguarding procedures and policies can be made by learners, staff and other people - and that they receive an appropriate response;
- Regularly refreshing our policies and procedures about safeguarding in light of lessons from research and Safeguarding Adults Reviews and maintaining an action plan for continuous improvement;
- Promoting the highest standards of safeguarding practice across the sector, including robust standards for safe recruitment and ongoing checks;
- Carrying out annual audits on our performance and complying fully with the requirements of the local safeguarding boards to undertake statutory audits.

Safe Employment

Robust procedures are in place to ensure that staff are employed safely. This means:

- There is a culture throughout the organisation that enables safeguarding issues to be addressed.
- Recruitment and vetting procedures prevent unsuitable people from having contact with learners, including enhanced DBS checks.
- Staff have appropriate safeguarding and safe working practices training, including induction, consistent with their role and function. This training will reflect the necessity for effective multi-agency and inter-professional working – both within TOAST and with other organisations.

- Safe working practices are promoted and poor and unsafe practice is challenged.
- Allegations or concerns about staff relating to safeguarding matters adults are handled in accordance with the Cornwall and Isles of Scilly Safeguarding Adults Board Multi-agency Safeguarding Adults policy.
- Effective arrangements such as a whistle blowing policy, which explicitly describes arrangements for sharing concerns about the behavior of colleagues and other members of staff are described at induction and training.

Conduct, Recording and Reporting suspicions of abuse and disclosures

Where a person makes comments to a member of staff that give cause for concern (disclosure), or the staff member observes signs or signals that gives cause for concern such as significant changes in behaviour/deterioration in general well-being/unexplained bruising, marks or signs of possible abuse or neglect, that member of staff:

- listens to the person, offers reassurance and gives assurance that she or he will take action;
- do not be judgemental or jump to conclusions;
- listens carefully to what they are telling you, stay calm, get as clear a picture as you can;
- make sure they have all the aids and support they may need to communicate as clearly as possible;
- uses open-ended questions using the TED principles; Tell me, Explain, Describe.
- do not start to investigate or ask detailed or probing questions
- helps the adult stay as much in control of their situation as possible, what do they want to happen now? What do they think needs to change?
- explains that you have a duty to tell your manager, you cannot keep secrets.
- reassure the person that they will be involved in decisions about them
- explains next steps including what the safeguarding processes are.
- makes a written record that forms an objective record of the observation or disclosure that includes:
    1. the person's name
    2. the person's address
    3. the age/ date of birth of the person
    4. the date and time of the observation or the disclosure;
    5. the exact words spoken by the person as far as possible;
    6. the name of the person to whom the concern was reported, with date and time,
    7. the names of any other person present at the time;
    8. an objective, factual and accurate record of the disclosure;

ALL records are signed, dated and stored securely (in accordance with the General Data Protection Regulation 2018).

We ensure that the young person has a clear understanding of the procedures followed by TOAST when dealing with a disclosure. We keep the young people informed at every step of the process to ensure they feel safe.

Staff Policy and code of conduct

September 2023 to be reviewed September 2024

The designated safeguarding lead for CN4C is Emma Wooderson
The deputy safeguarding lead for TOAST is: Lowenna Mudge
You can contact them with any concerns about a learner.

However, it is important to remember that Safeguarding is everyone's responsibility and all staff who, during the course of their employment have direct or indirect contact with learners, or who have access to information about them, have a responsibility to safeguard and promote the welfare of learners.

The purpose of this policy is to safeguard and protect the Young People attending TOAST.

All staff who have direct contact with the Learners will have a full up to date DBS and will attend the relevant level of safeguarding training and keep training updated.

If there is any cause for concern about a learner regarding attendance or safeguarding this must be recorded on CPOMS and in the safeguarding section on the CN4C database.

If you are concerned about the immediate safety of any young person, you must report directly to one of the DSL 's listed above immediately.

Daily attendance will be recorded on the SIL registers all tutors are responsible for the daily update of the registers.

Code of conduct

We are safer recruitment trained and follow safer recruitment processes.

All staff have a fully comprehensive induction training, including Prevent (in-house training and online training through the home office and Education Training foundation), safeguarding (online through the NSPCC and in-house delivered by the safeguarding team) and awareness of their roles and responsibilities.

Staff and teaching assistants follow the staff behaviour code of conduct policy. Teaching assistants have a Learner Support Behaviour Policy.

All staff read part one, annex B, part 4 and 5 of Keeping Children Safe in Education 2023 and receive engaging in-house training in these areas.

The DSL and the DDSL have read the whole of Keeping Children Safe in Education 2023 and have had training with the NSPCC on updates.

All staff after reading and having their training sign the CN4C Keeping Children Safe in Education form to recognise their understandings.

All staff complete a quiz related to Keeping Children Safe in Education and safeguarding procedures that has a compulsory pass rate.

The Designated Safeguarding Lead has had level four DSL training.

The Deputy Safeguarding Lead is trained at safeguarding level 3 and attends the safeguarding updates through the NSPCC.

Staff keep up to date with government safeguarding updates and legislation.

The Pastoral and Deputy lead are SEND safeguarding trained (through the NSPCC) and feed this training back to all staff in training days to ensure all our young people are safeguarded to the highest standards.

No personal mobile phones should be in use in the classroom. Personal mobile phones should be kept in the TOAST office. No photos or videos of learners should be taken on staff personal phones.

Photos, videos and media content should only be taken on work phones supplied by CN4C and only when the learner or parent has provided signed consent on the media consent form.

It is inappropriate for a member of staff to 'follow' or 'friend or accept requests' from learners on any social media platform.

All staff are aware of how and where to report staff allegations through LADO. All staff have a copy of the LADO process flow chart. It is also attached to this policy.